



15 May, 2019

Mr. Martin Fletcher  
Chief Executive Officer  
Australian Health Practitioners Regulation Agency

Dear Mr. Fletcher,

**Public consultation on the definition of 'cultural safety'**

Thank you for the opportunity to provide a submission to this consultation on the consistent use and definition of 'cultural safety' within the health care professions.

Established in 1924, the Australian Nursing and Midwifery Federation (ANMF) is the largest professional and industrial organisation in Australia for nurses and midwives, with Branches in each State and Territory of Australia. The core business of the ANMF is the professional and industrial representation of our members, the professions of nursing and midwifery, and promoting the health and wellbeing of our communities.

Our response represents the views of our membership of 275,000 nurses, midwives and assistants in nursing employed in a wide range of enterprises in urban, rural and remote locations in both the public and private health and aged care sectors.

We applaud the decision to create and implement a definition of 'cultural safety' that is agreed to and made in collaboration with Aboriginal and Torres Strait Islander health leaders. This collaboration will promote consistency in meaning and terminology across Australia's health professional groups. ANMF notes the extensive consultation already undertaken by the Nursing and Midwifery Board of Australia (NMBA) in collaboration with Congress of Aboriginal Torres Strait Islander Nurses and Midwives (CATSINaM) to create the definition of cultural safety included in the *Nursing and Midwifery Board of Australia Code of conduct for nurses*, as below.

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**ANMF Journals**

Australian Nursing and  
Midwifery Journal (ANMJ)  
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Australian Journal of  
Advanced Nursing (AJAN)  
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### Proposed definition

*Cultural safety is the individual and institutional knowledge, skills, attitudes and competencies needed to deliver optimal health care for Aboriginal and Torres Strait Islander Peoples as determined by Aboriginal and Torres Strait Islander individuals, families and communities.*

### Questions

1. Will having a single definition for the National Scheme and NHLF be helpful? Why or why not? Are there unintended consequences of a single definition?

The advantage of a single definition means that different health practitioner disciplines working in Australia's health care system will be using a common, and commonly understood, concept, facilitating communication, and shared documentation, and the provision of best practice care.

2. Does this definition capture the elements of what cultural safety is? If not, what would you change?

The ANMF believes the proposed definition falls short of encompassing the most useful and necessary components of cultural safety. Specifically, the proposed definition makes no reference to the traumatic, enduring, multigenerational effects of colonisation, including the introduction and continuation of racist policies (within and outside health care) that continue to significantly contribute to the gap between non-Indigenous and Aboriginal and Torres Strait Islander people's health care and health care outcomes.

Accordingly, ANMF submits that the definition of cultural safety contained within the *Nursing and Midwifery Board of Australia Code of conduct for nurses* be adopted.

3. Do you support the proposed draft definition? Why or why not?

No. The proposed definition does not adequately characterise the totality of cultural safety, which is critical. The ANMF fully supports and endorses the comprehensive definition of cultural safety that was developed and adopted by the Nursing and Midwifery Board of Australia (NMBA) in conjunction with the Congress of Aboriginal and Torres Strait Islander Nurses and Midwives (CATSINaM). The ANMF believes this should be adopted by the Australian Health Practitioners Regulating Agency, as it is inclusive of all cultural elements of cultural safety, and demonstrates strong commitment to cultural safety in clinical practice.



4. What other definitions, frameworks or policies should NRAS and NHLF's definition of cultural safety support?

Please see below.

5. Is there anything else you'd like to tell us about the draft definition?

The ANMF supports the NMBA's 2018 decision to set expectations of the provision of culturally safe care within the nursing and midwifery Codes of Conduct, with the expectation that these professions will deliver care within a larger culturally safe, competent, and collaborative health care framework.

The ANMF, on behalf of our nurse and midwife members, has been a driver for acknowledging the need for recognition of the concept of cultural safety, particularly in relation to health care provision for and with Aboriginal and Torres Strait Islander people, and of embedding in nursing and midwifery education information that ensures health care delivery incorporates cultural safe practices, including understandings of the multigenerational impact of colonisation on these populations' health and health care outcomes. We note that it was our Māori nursing colleagues who first identified and advocated for this concept of care, over thirty years ago.

We request you refer to the NMBA and CATSINaM joint statement on culturally safe care, which contextualises the NMBA definition, and describes how using this understanding contributes to better patient care and outcomes.

We appreciate the opportunity to participate in this consultation process and provide our feedback on behalf of our membership. Should you require further information on this matter, please contact Julianne Bryce, Senior Federal Professional Officer, ANMF Federal Office, Melbourne on 03 9602 8500 or [julianne@anmf.org.au](mailto:julianne@anmf.org.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Annie Butler'.

**Annie Butler**  
Federal Secretary